

Exhibit N

SPADAFORA & VERRASTRO, LLP

Attorneys and Counselors at Law

The Birge Mansion

James P. Verrastro
Kelly A. Feron
Richard E. Updegrove
Joseph C. Todoro
Katie M. Poleon*

*Also admitted in Illinois

John E. Spadafora, Retired

Legal Assistants:
Kathy L. Verrastro
Linda A. Laurendi

VIA HAND DELIVERY

July 18, 2012

Carmen J. Gentile, Esq.
Assistant Corporation Counsel
1100 City Hall, 65 Niagara Square
Buffalo, New York 14202

Re: Zachary Adamson v. City of Buffalo, et al
No. 11-CV-0663A

Dear Mr. Gentile:

Pursuant to yesterday's conversation, please allow this letter to confirm the deposition examinations of Defendants Joseph Cook, Michael Keane and Sharon Acker will be conducted at your offices on August 10, 2012 at 10:00 a.m.

Enclosed please find Plaintiff's Cross Notice to take Deposition upon Oral Examination in regards to same.

Thank you for your ongoing attention in regard to this matter

Very truly yours,

SPADAFORA & VERRASTRO, LLP


Joseph C. Todoro

JCT/klk
Enclosure

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ZACHARY ADAMSON,

Plaintiff,

- vs. -

CROSS NOTICE TO TAKE
DEPOSITION
UPON ORAL EXAMINATION

Civil Docket No. 11-CV-0663A

CITY OF BUFFALO, CITY OF BUFFALO
POLICE DEPARTMENT, JOSEPH COOK,
MICHAEL KEANE and SHARON ACKER,

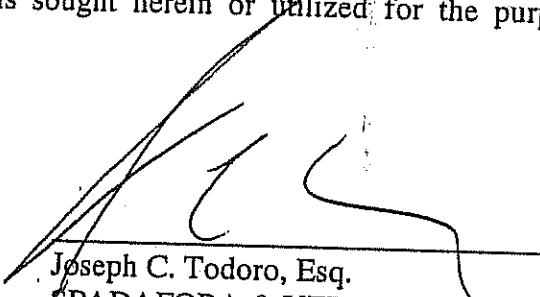
PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure, the testimony, upon oral examination, of Defendants JOSEPH COOK, MICHAEL KEANE and SHARON ACKER and the representative of Defendants, CITY OF BUFFALO and/or CITY OF BUFFALO POLICE DEPARTMENT, will be taken before a Notary Public who is not an attorney, or employee of an attorney, for any party or prospective party herein and is not a person who would be disqualified to act as a juror because of interest or because of blood relationship, kinship or close agreement to any party herein, at 10:00a.m., on Friday, August 10, 2012 at 1100 City Hall, 65 Niagara Square, Buffalo, New York 14202. That the said persons to be examined are required to produce at such examination the following:

1. See attached Exhibit A.

That the matters upon which such persons are to be examined are all the relevant facts and circumstances in connection with the accident alleged in the Complaint herein, including negligence, assault, wrongful arrest, false imprisonment, excessive force, civil rights violations, liability and damages.

PLEASE TAKE FURTHER NOTICE that the parties to be examined are requested to produce upon said examination any and all records, memoranda and data in their possession relating to the matters upon which the examination is sought herein or utilized for the purpose of refreshing the witness' recollection.

DATED: July 18, 2012
Buffalo, New York



Joseph C. Todoro, Esq.
SPADAFORA & VERRASTRO, LLP
Attorneys for Plaintiff
2 Symphony Circle
Buffalo, New York 14201
(716) 854-1111

TO: Carmen J. Gentile, Esq.
Assistant Corporation Counsel
Attorneys for Defendants
1100 City Hall, 65 Niagara Square
Buffalo, New York 14202
(716) 851-4332

REQUESTED DOCUMENTS

1. Produce a copy of your credentials, including any resume or other document describing current employers, past employers and work experience, and education.
2. Produce a copy of any and all certificates or any other documents received through May 2010 as verification of the completion of staff in-service, continuing education, or any other training program that you have taken that was required or recommended by the City of Buffalo and/or City of Buffalo Police Department, whether provided by the City of Buffalo or City of Buffalo Police Department itself or not.
3. Produce a copy of any and all certificates or any other documents received as verification of the completion of any training received in satisfaction of a recommendation or requirement by any level of government to which you are subject as an officer or employee with the City of Buffalo and/or City of Buffalo Police Department.
4. Produce a copy of any materials used for training or instruction, or which were otherwise provided for your information, during any training program for which you have provided documents in response to paragraphs 2 and 3 of this request.
5. Produce a copy of any notes, handwritten or otherwise, taken during or in relation to any training session for which you have provided documents in response to paragraphs 2 and 3 of this request.
6. Produce a copy of any and all calendars, schedules, or any other documents outlining, describing, or otherwise memorializing the course of your work activity on April 1, 2010.

7. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, describing any personal observations, analysis, recommendations, or stating any other facts or opinions about Plaintiff, ZACHARY ADAMSON.

8. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, naming Plaintiff, ZACHARY ADAMSON, for any reason.

9. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, recounting or otherwise memorializing any contact you or anyone else had with Plaintiff, ZACHARY ADAMSON, on April 1, 2010.

10. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, relating to the use of force against suspects, persons in custody, or other persons arrested by you as an employee of the City of Buffalo and/or City of Buffalo Police Department.

11. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, relating to the search incident to arrest of suspects, persons of interest, persons in custody, or other persons arrested by you as an employee of the City of Buffalo and/or City of Buffalo Police Department.

12. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, explaining or otherwise expressing any personally held opinion, viewpoint, or any observation made about any policy of the City of Buffalo and/or City of Buffalo Police Department with regard to detaining and arresting of suspects, persons in custody, persons of interest, and other persons.

13. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, explaining or otherwise expressing any personally held opinion, viewpoint, or any observation made about any policy of the City of Buffalo and/or City of Buffalo Police Department with regard to using physical force in detaining and arresting of suspects, persons in custody, persons of interest, and other persons.

14. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, explaining or otherwise expressing any personally held opinion, viewpoint, or any observation made about the arrest of Plaintiff, ZACHARY ADAMSON, on April 1, 2010.

15. Produce a copy of any and all documents of any type, including but not limited to informal notes, letters, emails, or any official documentation, which you have either produced or received, explaining or otherwise expressing any personally held opinion, viewpoint, or any observation made about any investigation initiated or any procedure invoked in response to the treatment of Plaintiff, ZACHARY ADAMSON, during his arrest on April 1, 2010.

16. Produce a copy of any and all employment manuals, policies and procedures, rules and regulations, or other written employment instructions and guides provided to you by the City of Buffalo and/or Buffalo Police Department in regard to the following: a. Arresting an individual for a Felony, Misdemeanor or Violation; b. The restraining or subduing of suspects; c. The use of force when making an arrest and d. The use of force when restraining or subduing a suspect.

17. Produce a copy of any and all use of force reports relating to the incident which occurred on April, 1 2010 at approximately 7:15 p.m.
18. Produce a copy of any and all prior formal complaint made against you as an employee of the City of Buffalo and/or City of Buffalo Police Department.
19. Produce a copy of your personnel file as an employee of the City of Buffalo and/or City of Buffalo Police Department.
20. Produce a copy of any and all performance evaluations in the five (5) years preceding the subject incident and since that period of time including any and all performance evaluation for April 1, 2010.